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Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Time-Critical Removal Action – Former Plainwell Impoundment  
Monthly Report (November 2007)

INDUSTRIAL

Dear Michael:

Date:

December 17, 2007

Attached is the ninth monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Time-Critical Removal Action (TCRA). This progress report is submitted in accordance with Section 19A of the February 2007 Administrative Settlement Agreement and Order on Consent for Removal Action (Docket No. V-W-07-C-863).

Contact:

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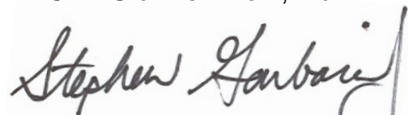
If you have any questions, please do not hesitate to contact me.

E-mail:

steve.garbaciak@  
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Sincerely,

ARCADIS of New York, Inc.



Stephen Garbaciak Jr., P.E.  
Principal Engineer/Vice President

Our ref:

B0064530.014

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Imagine the result

**MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/  
KALAMAZOO RIVER SUPERFUND SITE  
TIME-CRITICAL REMOVAL ACTION (TCRA) – FORMER PLAINWELL IMPOUNDMENT**

**REPORT #9, NOVEMBER 2007**

**PREPARED BY ARCADIS BBL  
DECEMBER 17, 2007**

**ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP**

**SUBMITTED TO**

**MICHAEL RIBORDY, ON-SCENE COORDINATOR  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site TCRA – Former Plainwell Impoundment**

**REPORT #9, NOVEMBER 2007**

**Significant Developments and Activities During the Period**

- On November 2, the KRSG received a hard copy of the USEPA fact sheet titled *Plainwell PCB Cleanup Progress and Updates*.
- On November 6, the KRSG submitted a copy of the 26<sup>th</sup> *Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.
- On November 7, the KRSG attended the USEPA-hosted Public Open House/Question and Answer Session in Plainwell.
- On November 13, the KRSG submitted a copy of the 27<sup>th</sup> *Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.
- On November 14 and 28, the KRSG submitted copies of analytical data from TCRA sampling activities to USEPA.
- On November 15, the KRSG submitted the eighth *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site TCRA* for October 2007 to USEPA.
- On November 15, the KRSG submitted electronic copies of TCRA Sediment Removal Plan contract drawings to USEPA and MDEQ.
- On November 20, the KRSG received copies of analytical data from split samples collected by the USEPA during TCRA activities.
- On November 20, the KRSG notified the USEPA and MDEQ regarding use of the Ottawa Farms County Landfill for disposal of TCRA waste material.
- On November 20, the KRSG submitted an electronic request to the USEPA to seek written notice that mobilization at the TCRA site has been completed, as required by Paragraph 39 of the TCRA AOC. The USEPA provided this written notice to the KRSG via email on November 26.
- On November 20, the KRSG submitted a copy of the 28<sup>th</sup> *Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.
- By November 30, the KRSG had obtained property access agreements, as required by Paragraph 23 of the TCRA AOC (Table A), from eleven property owners. At this time, an access agreement for all the properties requiring access has been received.

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site TCRA – Former Plainwell Impoundment**

**REPORT #9, NOVEMBER 2007**

**Data Collected and Field Activities Conducted During the Period**

- During the week of November 1, the KRSG continued excavation of soil and sediment at the Phase 1 Cofferdam Area and in Removal Area 7; continued installation of the water control structure (WCS); continued dewatering activities in the Phase 1 Cofferdam Area; and installed topsoil around the former Staging Area 1N. Prior to discharge, wastewater samples W\_SA3S\_Influ\_0006, W\_SA3S\_MidB\_0006 and W\_SA3S\_EffluB\_0006 were collected from the influent port, the left midpoint port and the left effluent port, respectively, from the 25 gallons per minute (GPM) water treatment system located at Staging Area 3S. Table B summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal.
- During the week of November 5, the KRSG continued excavation of soil and sediment at the Phase 1 Cofferdam Area and in Removal Area 7; commenced work activities in the Phase 1 Cofferdam Area embankment area (material excavation, grading, and demolition of the old powerhouse structure); began excavating material downstream of the WCS for the installation of erosion control measures; and continued installation of the WCS. Two surface water samples (K30675 and K30677) were collected from locations 300 feet downstream and 200 feet upstream, respectively, of Removal Area 7 for PCB analysis. A rinse blank (K30678) was also collected. Wastewater samples W\_CDA1\_Influ\_0004 (influent port), W\_CDA1\_TS002 and W\_CDA1\_Mid\_0004 (midpoint port), W\_CDA1\_TS003 and W\_CDA1\_Efflu\_0004 (effluent port) were collected from the 500 GPM water treatment system located near the Plainwell Dam. Table B summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal.
- During the week of November 12, the KRSG completed excavation of soil and sediment at the Phase 1 Cofferdam Area and in Removal Area 7; continued work activities in the Phase 1 Cofferdam Area embankment area (material excavation, grading, and demolition of the old powerhouse structure); continued excavating material downstream of the WCS for the installation of erosion control measures; commenced decontamination and decommissioning of the 500 GPM water treatment system; and continued installation of the WCS. Eleven sediment samples (K55326 and K55328 through K55337) and one duplicate sample (K55327) were collected from Removal Area 7. The USEPA collected split samples of K55331 (APS-111507-10-SD/K55331) and K55333 (APS-111507-11-SD/K55333). Two surface water samples (K30674 and K30680) were collected from a location 300 feet downstream and two surface water samples (K30676 and K30681) were collected from a location 200 feet upstream of Removal Area 7 for PCB analysis. Two rinse blanks (K30679 and K30682) were also collected. Prior to discharge, wastewater samples W\_SA3S\_Influ\_0007 and W\_SA3S\_Influ\_0008 (influent port), W\_SA3S\_MidA\_0006 and W\_SA3S\_MidA\_0007 (midpoint port, right side), W\_SA3S\_MidB\_0007 and W\_SA3S\_MidB\_0008 (midpoint port, left side), W\_SA3S\_EffluA\_0006 and W\_SA3S\_EffluA\_0007 (effluent port, right side), W\_SA3S\_EffluB\_0007

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and W\_SA3S\_EffluB\_0008 (effluent port, left side) were collected from the 25 GPM water treatment system located at Staging Area 3S. Prior to the decommissioning of the 500 GPM water treatment system, two carbon samples (CARBON 1 and CARBON 2) and one sand sample (SAND 1) were collected from the two carbon filters and one sand filter, respectively, associated with the system. The samples will determine how the media will be disposed. Table B summarizes the samples collected. No material was transported offsite for disposal.

- During the week of November 19, the KRSG continued work activities in the Phase 1 Cofferdam Area embankment area (material excavation, grading, and demolition of the old powerhouse structure); installed gabion baskets downstream of the WCS; continued installation of the WCS; and continued decommissioning and decontamination of the 500 GPM water treatment system. Two surface water samples (K30683 and K30684) were collected from locations 300 feet downstream and 200 feet upstream, respectively, of Removal Area 7 for PCB analysis. A rinse blank (K30685) was also collected. Table B summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan (non-TSCA material) for disposal.
- During the week of November 26, the KRSG continued work activities in the Phase 1 Cofferdam Area embankment area (material excavation, grading, and demolition of the old powerhouse structure); commenced excavation of soil and sediment at Removal Area 8; continued installation of the WCS; and continued decommissioning and decontamination of the 500 GPM water treatment system. Two surface water samples (K30686 and K30687) were collected from locations 300 feet downstream and 200 feet upstream, respectively, of Removal Area 8 for PCB analysis. A rinse blank (K30688) was also collected. Prior to discharge, wastewater samples W\_SA3S\_Influ\_0009 and W\_SA3S\_Influ\_0010 (influent port), W\_SA3S\_MidA\_0008 and W\_SA3S\_MidA\_0009 (midpoint port, right side), W\_SA3S\_MidB\_0009 and W\_SA3S\_MidB\_0010 (midpoint port, left side), W\_SA3S\_EffluA\_0008 and W\_SA3S\_EffluA\_0009 (effluent port, right side) and W\_SA3S\_EffluB\_0009 and W\_SA3S\_EffluB\_0010 (effluent port, left side) were collected from the 25 GPM water treatment system located at Staging Area 3S. A duplicate of sample W\_SA3S\_EffluB\_0009 (W\_SA3S\_Dup\_0003) was also collected. Prior to removal of the earthen berm located downstream of the WCS, sand sample K25752 was collected to determine how this material should be disposed. Solidified material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan (non-TSCA material) for disposal.
- As of November 30, approximately 26,000 cubic yards of material has been excavated from Removal Areas 1, 2A and 2B, 3A and 3B, 4A and 4B, 5, 6A and 6B, 7, 8, the Phase 1 Cofferdam Area, Upland Areas 3A1, 3A2, 4A1 and 6B1, and Islands 1, 2, and 3.

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
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**Laboratory Data Received During the Period**

- During the week of November 5, the KRSG received analytical data for surface water samples K30670 through K30673 (collected in October), wastewater samples W\_SA3S\_Influ\_0006, W\_SA3S\_MidB\_0006, W\_SA3S\_EffluB\_0006, W\_CDA1\_TS002 and W\_CDA1\_TS003, and soil sample K25751 (collected in October).
- During the week of November 12, the KRSG received analytical data for sediment confirmation samples K55326 through K55328 and K55331 through K55333, USEPA sediment confirmation split samples APS-111507-10-SD/K55331 and APS-111507-11-SD/K55333 and wastewater samples W\_CDA1\_Influ\_0004, W\_CDA1\_Mid\_0004, W\_CDA1\_Efflu\_0004, W\_SA3S\_Influ\_0007, W\_SA3S\_Influ\_0008, W\_SA3S\_MidA\_0006, W\_SA3S\_MidA\_0007, W\_SA3S\_MidB\_0007, W\_SA3S\_MidB\_0008, W\_SA3S\_EffluA\_0006, W\_SA3S\_EffluA\_0007, W\_SA3S\_EffluB\_0007, and W\_SA3S\_EffluB\_0008.
- During the week of November 19, the KRSG received analytical data for sediment confirmation samples K55329, K55330 and K55334 through K55337.
- During the week of November 26, the KRSG received analytical data for surface water samples K30675, K30677 and K30678, wastewater samples W\_SA3S\_Influ\_0009, W\_SA3S\_Influ\_0010, W\_SA3S\_MidA\_0008, W\_SA3S\_MidA\_0009, W\_SA3S\_MidB\_0009, W\_SA3S\_MidB\_0010, W\_SA3S\_EffluA\_0008, W\_SA3S\_EffluA\_0009, W\_SA3S\_EffluB\_0009, W\_SA3S\_EffluB\_0010 and W\_SA3S\_Dup\_0003, carbon samples CARBON 1 and CARBON 2, sand sample SAND 1 and total petroleum hydrocarbon (TPH) data for sand sample K25752.
- The KRSG is awaiting analytical results for surface water samples K30674, K30676, and K30679 through K30688 and sand sample K25752 (with the exception of TPH data).

**Issues Encountered and Actions Taken**

- On November 4, dewatering activities in the Phase 1 Cofferdam Area were conducted. After less than two hours of operation, a visible silt plume was observed near the outfall location. It could not be determined if the discharge water was turbid or scouring of the river bottom was occurring. Discharge was suspended until the problem could be corrected. The discharge point was placed inside the turbidity curtain downstream of the WCS and placed on top of the curtain to avoid scouring. The visible silt plume was eliminated as a result of these design changes and water treatment and discharge continued.
- Throughout the month, C&C Landfill limited the volume of material that they accepted due to capacity issues. During the week of November 12, C&C Landfill did not accept any material, and no waste has

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been transported to that landfill since that time. Beginning the week of November 19, all material has been transported to Ottawa Farms County Landfill in Coopersville, Michigan for disposal. Ottawa Farms County Landfill has not informed the KRSG of any problems regarding the quality or quantity of waste being disposed.

- Due to the completion of excavation activities in the Phase 1 Cofferdam Area, the 500 GPM treatment system was shutdown for 2007 during the week of November 5. Decommissioning and decontamination of the system commenced during the week of November 12.
- On November 26, field personnel observed erosion in the upstream section of Removal Area 7. An area approximately 25 feet long and 5 feet wide eroded, leaving free-flowing water between the turbidity curtain/diversion wall and the bank soil. River rock was installed to prevent additional erosion in the short term, and the area was re-graded and backfilled throughout the week of November 26 to prevent future erosion. A subsequent post-repair inspection revealed the area appeared stable and in good condition by the end of the week. No significant erosion has been observed since that time.
- On November 29, representatives from Consumers Energy met with the KRSG and approved a plan to excavate sediment around a Consumers Energy utility pole in Removal Area 7. The material was initially left in place due to restrictions in the access agreement with Consumers Energy regarding working in proximity to utility poles. The overhead electrical line was de-energized and KRSG is responsible for maintaining the stability of the pole during and after excavation activities. This area is scheduled to be excavated during the week of December 3.

**Developments Anticipated During the Next Reporting Period**

- During the week of December 3, the KRSG is scheduled to: Submit to the USEPA a surface sediment sampling plan regarding the removal area end-of-year sampling; continue excavating soil and sediment at Removal Area 8; continue processing, transporting and disposing of soil and sediment at the Ottawa County Farms Landfill; continue work activities in the Phase 1 Cofferdam Area embankment area (material excavation, grading, and demolition of the old powerhouse structure); remove the sediment located around the utility pole in Removal Area 7; and continue installation of the WCS (catwalk, concrete and stop logs).
- During the week of December 10, the KRSG is scheduled to: Complete installation of the WCS; continue to excavate soil from Removal Area 8; continue processing, transporting and disposing of soil and sediment at the Ottawa County Farms Landfill; continue work activities in the Phase 1 Cofferdam Area embankment area (material excavation, grading, and demolition of the old powerhouse structure); and host the monthly Stakeholders meeting onsite.

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- During the week of December 17, the KRSG is scheduled to: Complete the excavation of soil from Removal Area 8; complete work activities in the Phase 1 Cofferdam Area embankment area (material excavation, grading, and demolition of the old powerhouse structure); and continue processing, transporting and disposing of soil and sediment at the Ottawa County Farms Landfill.
- No activities are planned for the week of December 24.
- The KRSG will continue to submit the *Weekly Construction Reports for the Plainwell TCRA* to USEPA and MDEQ in December.
- The KRSG will continue to submit copies of analytical data from TCRA sampling activities to USEPA in December.
- By November 30, the KRSG had obtained property access agreements, as required by Paragraph 23 of the TCRA AOC (Table A), from eleven property owners. At this time, an access agreement for all the properties requiring access has been received. If access to other properties becomes necessary, the KRSG will negotiate additional property access agreements at that time.
- Throughout December, the KRSG will, as necessary, continue to submit Subcontractor Qualification Notifications to USEPA, as required by Paragraph 11 of the TCRA AOC.



**Kalamazoo River Study Group  
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Former Plainwell Impoundment TCRA  
Monthly Report #9, November 2007**

**Table A — Summary of Property Access Agreements (as of November 30, 2007)**

<b>Date Sent</b>	<b>Property Owner</b>	<b>Status</b>
3/19/2007	A.C. Geenen Associates	NA
3/9/2007	Aggregate Industries (Bill Smith Sand and Gravel)	accepted
3/9/2007	Allen Robinson	accepted
3/9/2007	Balkema Excavating	accepted, amended 9/26/07
3/9/2007	Brad Keeler	accepted
3/9/2007	City of Plainwell	accepted
3/26/2007	Consumers Energy	accepted
3/9/2007	Meijer, Inc.	accepted
3/21/2007	Plainwell Group LLC	accepted
3/16/2007	Robert Foster Trust	rejected, NA
3/9/2007	Robert Keeler Trust	accepted
3/9/2007	Rolfe Family Trust	accepted, extended 10/10/07
3/16/2007	Shirley Foster	NA
3/9/2007	Steven Peterson	accepted

Note:

NA = Not applicable; changes to original design have eliminated the need to access this property.

Kalamazoo River Study Group  
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**Table B — Summary of Samples Collected and Data Received in November 2007**

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action		
Sediment Confirmation Samples											
K55326 [K55327]	11/15/07	11/16/07	074784	KAR Labs	RA 7, Grid 1	PCBs	< 0.33 mg/kg	5 mg/kg	None		
K55328					RA 7, Grid 1 (BS)	[PCBs]	[< 0.33 mg/kg]	[5 mg/kg]	None		
K55331 <sup>1</sup>					RA 7, Grid 4 (BS)	PCBs	1.4 mg/kg	5 mg/kg	None		
[K55331] APS-111507-10-SD/K55331			[0711357]	TCRA14 Laboratories			[PCBs]	[1.58 mg/kg]	[5 mg/kg]	None	
K55332			074784	KAR Labs			RA 7, Grid 2	PCBs	< 0.33 mg/kg	5 mg/kg	None
K55333 <sup>1</sup>							RA 7, Grid 2 (BS)	PCBs	< 0.33 mg/kg	5mg/kg	None
[K55333] APS-111507-11-SD/K55333			[0711357]	TCRA14 Laboratories	[PCBs]	[< 0.056 mg/kg]	[5]	None			
K55329	11/16/07	11/19/07	074804	KAR Labs	RA 7, Grid 3 (BS)	PCBs	< 0.33 mg/kg	5 mg/kg	None		
K55330					RA 7, Grid 3	PCBs	3.2 mg/kg	5 mg/kg	None		
K55334					RA 7, Grid 4	PCBs	3.7 mg/kg	5 mg/kg	None		
K55335					RA 7, Grid 5	PCBs	0.57 mg/kg	5 mg/kg	None		
K55336					RA 7, Grid 6	PCBs	< 0.33 mg/kg	5 mg/kg	None		
K55337					RA 7, Grid 5 (BS)	PCBs	< 0.33 mg/kg	5 mg/kg	None		
Surface Water Samples											
K30670	10/25/07	11/08/07	074330	KAR Labs	300' downstream of RA 7	PCBs	< 0.1 µg/L	-	None		
K30671 [K30673]					200' upstream of RA 7	PCBs	< 0.1 µg/L	-	None		
K30672						[PCBs]	[< 0.1 µg/L]	-	None		
K30675	11/05/07	11/26/07	TCRA14	TAL	Rinse Blank	PCBs	< 0.1 µg/L	-	None		
K30677					300' downstream of RA 7	PCBs	< 0.56 µg/L	-	None		
K30678					200' upstream of RA 7	PCBs	< 0.55 µg/L	-	None		
K30674	11/13/07	NR	NR	TAL	Rinse Blank	PCBs	< 0.61 µg/L	-	None		
K30676					300' downstream of RA 7	PCBs	-	-			
K30679					200' upstream of RA 7	PCBs	-	-			
K30680	11/15/07	NR	NR	TAL	Rinse Blank	PCBs	-	-			
K30681					300' downstream of RA 7	PCBs	-	-			
K30682					200' upstream of RA 7	PCBs	-	-			
K30683	11/23/07	NR	NR	TAL	Rinse Blank	PCBs	-	-			
K30684					300' downstream of RA 7	PCBs	-	-			
K30685					200' upstream of RA 7	PCBs	-	-			
K30686	11/29/07	NR	NR	TAL	Rinse Blank	PCBs	-	-			
K30687					300' downstream of RA 8	PCBs	-	-			
K30688					200' upstream of RA 8	PCBs	-	-			
					Rinse Blank	PCBs	-	-			

See Notes on Page 4.

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**Table B — Summary of Samples Collected and Data Received in November 2007**

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
<b>Wastewater Samples</b>									
W_SA3S_Influ_0006	11/02/07	11/06/07	074594	KAR Labs	Staging Area 3S, Discharge 6, influent sample	PCBs	0.1 µg/L	-	None
W_SA3S_MidB_0006					Staging Area 3S, Discharge 6, midpoint sample, left side	PCBs	< 0.1 µg/L	-	None
W_SA3S_EffluB_0006					Staging Area 3S, Discharge 6, effluent sample, left side	PCBs, TSS, P	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L; P = 0.07 mg/L, No Action Limit
W_CDA1_TS002	11/06/07	11/07/07	074616	KAR Labs	500 GPM Water Treatment Facility, midpoint sample	TSS	-	-	None: TSS = 4 mg/L, Action Limit = 45 mg/L
W_CDA1_TS003					500 GPM Water Treatment Facility, effluent sample	TSS	-	-	None: TSS = 28 mg/L, Action Limit = 45 mg/L
W_CDA1_Influ_0004	11/09/07	11/12/2007	074698	KAR Labs	500 GPM Water Treatment Facility, influent sample	PCBs	0.3 µg/L	-	None
W_CDA1_Mid_0004					500 GPM Water Treatment Facility, midpoint sample	PCBs	0.2 µg/L	-	None
W_CDA1_Efflu_0004					500 GPM Water Treatment Facility, effluent sample	PCBs, P	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: P = 0.21 mg/L, No Action Limit
W_SA3S_Influ_0007	11/12/07	11/13/07	074717	KAR Labs	Staging Area 3S, Discharge 7, influent sample	PCBs	< 0.1 µg/L	-	None
W_SA3S_MidA_0006					Staging Area 3S, Discharge 7, midpoint sample, right side	PCBs	< 0.1 µg/L	-	None
W_SA3S_EffluA_0006					Staging Area 3S, Discharge 7, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_MidB_0007					Staging Area 3S, Discharge 7, midpoint sample, left side	PCBs	< 0.1 µg/L	-	None
W_SA3S_EffluB_0007					Staging Area 3S, Discharge 7, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_Influ_0008	11/15/07	11/16/07	074789	KAR Labs	Staging Area 3S, Discharge 8, influent sample	PCBs	< 0.1 µg/L	-	None
W_SA3S_MidA_0007					Staging Area 3S, Discharge 8, midpoint sample, right side	PCBs	< 0.1 µg/L	-	None
W_SA3S_EffluA_0007					Staging Area 3S, Discharge 8, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_MidB_0008					Staging Area 3S, Discharge 8, midpoint sample, left side	PCBs	< 0.1 µg/L	-	None
W_SA3S_EffluB_0008					Staging Area 3S, Discharge 8, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L

See Notes on Page 4.

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**Table B — Summary of Samples Collected and Data Received in November 2007**

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
W_SA3S_Influ_0009	11/27/07	11/28/07	074888	KAR Labs	Staging Area 3S, Discharge 9, influent sample	PCBs	< 0.1 µg/L	-	None
W_SA3S_MidA_0008					Staging Area 3S, Discharge 9, midpoint sample, right side	PCBs	< 0.1 µg/L	-	None
W_SA3S_EffluA_0008					Staging Area 3S, Discharge 9, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_MidB_0009					Staging Area 3S, Discharge 9, midpoint sample, left side	PCBs	< 0.1 µg/L	-	None
W_SA3S_EffluB_0009 [W_SA3S_Dup_0003]					Staging Area 3S, Discharge 9, effluent sample, left side	PCBs, TSS [PCBs, TSS]	< 0.1 µg/L [< 0.1 µg/L]	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L [None: TSS = <4 mg/L, Action Limit = 45 mg/L]
W_SA3S_Influ_0010	11/29/07	11/30/07	074917	KAR Labs	Staging Area 3S, Discharge 10, influent sample	PCBs	< 0.1 µg/L	-	None
W_SA3S_MidA_0009					Staging Area 3S, Discharge 10, midpoint sample, right side	PCBs	< 0.1 µg/L	-	None
W_SA3S_EffluA_0009					Staging Area 3S, Discharge 10, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_MidB_0010					Staging Area 3S, Discharge 10, midpoint sample, left side	PCBs	< 0.1 µg/L	-	None
W_SA3S_EffluB_0010					Staging Area 3S, Discharge 10, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
Soil Samples									
K25751	10/24/07	11/06/07	074429	KAR Labs	Circular Consumers Energy property located near the Plainwell Dam	PCBs	< 0.33 mg/kg	-	None
Carbon Samples									
CARBON 1	11/14/07	11/29/2007	TCRA18	TAL	Sample of media in first carbon filter of the 500 GPM water treatment system	PCBs, TCLP VOCs, TCLP SVOCs, TCLP Pesticides, RCRA Metals	0.001 mg/kg	-	None, no constituents exceeded action limits
CARBON 2					Sample of media in second carbon filter of the 500 GPM water treatment system	PCBs, TCLP VOCs, TCLP SVOCs, TCLP Pesticides, RCRA Metals	6.8 x 10-4 mg/kg	-	None, no constituents exceeded action limits
Sand Samples									
SAND 1	11/14/07	11/29/2007	TCRA18	TAL	Sample of media in sand filter of the 500 GPM water treatment system	PCBs, TCL VOCs, TCL SVOCs, TCL Pesticides, RCRA Metals	1.5 x 10-4 mg/kg	-	None, no constituents exceeded action limits
K25752	11/27/07	11/29/2007 (KAR) / NR (TAL)	074912 (KAR) / NR (TAL)	KAR Labs and TAL	Sand from earthen berm constructed downstream of the water control structure	TPH (KAR), TCLP VOCs, TCLP SVOCs, TCLP Pesticides, RCRA Metals, Total PCBs (TAL)	-	-	No TPH concentrations were detected, the remainder of the analytical data has not been received

See Notes on Page 4.

Kalamazoo River Study Group  
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Former Plainwell Impoundment TCRA  
Monthly Report #9, November 2007

**Table B — Summary of Samples Collected and Data Received in November 2007**

Notes:

1 - Split sample collected by USEPA.

(BS) - Bank Sample.

GPM - Gallons Per Minute.

NR - Analytical results not yet received.

P - Phosphorus.

RA - Removal Area.

RCRA - Resource Conservation and Recovery Act.

SVOCs - Semi-Volatile Organic Compounds.

TAL - TestAmerica Laboratories.

TCL - Target Compounds List.

TCLP - Toxicity Characteristic Leaching Procedure.

TSS - Total Suspended Solids.

TPH - Total Petroleum Hydrocarbons.

VOCs - Volatile Organic Compounds.

mg/kg - milligrams per kilogram.

mg/L - milligrams per liter.

µg/L - micrograms per liter.

\* USEPA split samples are shown in bold and in brackets. USEPA split sample IDs are shown in bold and italicized font.

\* Duplicate samples are shown in brackets.

\* Analytical results have not been validated